

STATE OF NEW YORK DEPARTMENT OF PUBLIC SERVICE

THREE EMPIRE STATE PLAZA, ALBANY, NY 12223-1350

Internet Address: <http://www.dps.state.ny.us>

PUBLIC SERVICE COMMISSION

MAUREEN O. HELMER  
Chairman

JOHN B. DALY  
Deputy Chairman

THOMAS J. DUNLEAVY  
JAMES D. BENNETT

DOCKET FILE COPY ORIGINAL



LAWRENCE G. MALONE  
General Counsel

JOHN C. CRARY  
Secretary

RECEIVED  
23708  
FED MAIL ROOM

September 25, 1998.

Hon. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

Re: In the Matter of Deployment of Wireline Services  
Offering Advanced Telecommunications Capability  
Docket No. 98-147

Dear Ms. Salas:

Enclosed are an original and four copies of the  
Comments of the New York Department of Public Service in the  
above-captioned cases. These comments also have been filed using  
the Commission's Electronic Filing System.

Sincerely,

*Cheryl A. Callahan*  
for

Lawrence G. Malone  
General Counsel  
Public Service Commission  
of the State of New York  
Three Empire State Plaza  
Albany, New York 12223-1350

Enclosure  
(Original and Four Copies)

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

RECEIVED  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554  
JUN 10 1998

In the Matters of

Deployment of Wireline Services ) CC Docket No. 98-147  
Offering Advanced Telecommunications )  
Capability )

Petition of Bell Atlantic Corporation ) CC Docket No. 98-11  
For Relief from Barriers to Deployment )  
of Advanced Telecommunications Services )

Petition of US WEST Communications, Inc. ) CC Docket No. 98-26  
For Relief from Barriers to Deployment )  
of Advanced Telecommunications Services )

Petition of Ameritech Corporation to ) CC Docket No. 98-32  
Remove Barriers to Investment in )  
Advanced Telecommunications Technology )

Petition of the Alliance for Public ) CCB/CPD No. 98-15  
Technology Requesting Issuance of ) RM 9244  
Notice of Inquiry and Notice of )  
Proposed Rulemaking to Implement )  
Section 706 of the 1996 Telecommuni- )  
cations Act )

Petition of the Association for ) CC Docket No. 98-78  
Local Telecommunications Services )  
(ALTS) for a Declaratory Ruling )  
Establishing Conditions Necessary to )  
Promote Deployment of Advanced )  
Telecommunications Capability Under )  
Section 706 of the Telecommunications )  
Act of 1996 )

Southwestern Bell Telephone Company, ) CC Docket NO. 98-91  
Pacific Bell, and Nevada Bell Petition )  
for Relief from Regulation Pursuant to )  
Section 706 of the Telecommunications )  
Act of 1996 and 47 U.S.C. Section 160 )  
for ADSL Infrastructure and Service )

## TABLE OF CONTENTS

	<u>PAGE</u>
Introduction and Summary.....	1
Discussion.....	3
I. Provision of Interstate Advanced Services Through A Separate Affiliate.....	3
A. Structural Separation.....	3
B. Proposed Safeguards.....	5
C. Asset Transfers From ILEC to Advanced Services Affiliate.....	8
II. Collocation Requirements.....	9
III. Unbundling Obligations.....	12
CONCLUSION.....	14

COMMENTS OF THE NEW YORK STATE  
DEPARTMENT OF PUBLIC SERVICE

Introduction and Summary

The New York State Department of Public Service (NYDPS) submits these comments in response to the Commission's Memorandum Opinion and Order, and Notice of Proposed Rulemaking (NPRM) concerning the deployment of advanced telecommunication services. Six incumbent local exchange carriers (ILECs) -- Bell Atlantic, US West, Ameritech, Southwestern Bell, Pacific Bell, and Nevada Bell -- have petitioned the Commission for regulatory relief, purportedly to speed the deployment of advanced data services. The Association for Local Telecommunications Services (ALTS) also petitioned the Commission to apply all pro-competitive provisions of the Communications Act of 1934, as amended by the Telecommunications Act of 1996 (the Act), to advanced services and circuit switched voice services.

In response to these petitions, the Commission issued an Order and a Notice of Proposed Rulemaking designed to facilitate the deployment of advanced services.<sup>2</sup> In the order the Commission: (1) confirms that advanced services are subject to the pro-competitive provisions of the Act, including 251(a) and 251(c)(2) interconnection requirements (para. 11); (2)

---

<sup>1</sup> The Commission refers to advanced services in this instance as wireline, broadband telecommunications services such as those that use digital subscriber line technology (xDSL) and packet switched technology (para. 3). Our comments apply this definition of advanced services as well.

<sup>2</sup> The Commission notes that, although the various petitioners sought relief pursuant to Section 706 of the 1996 Act, it takes action pursuant to sections 201, 202, 251, and 271 of the Act.

September 25, 1998

clarifies that facilities and equipment used to provide advanced services are network elements and are subject to unbundling requirements under 251(c)(3)(para. 11); (3) denies the ILECs' request to forbear from applying §251 and/or §271 of the Act to advanced services (para. 12); and (4) initiates a rulemaking to strengthen collocation and unbundling requirements (para 14). The NPRM requests comments on: (1) terms for allowing Bell operating companies (BOCs) to establish a separate subsidiary to provide advanced services with minimal regulation; (2) methods for strengthening collocation requirements; (3) expanding loop unbundling obligations; (4) interpreting resale obligations; and (5) developing guidelines for limited interLATA relief.

The NYDPS offers comments with respect to: (1) separate advanced services affiliates; (2) collocation requirements; and (3) local loop unbundling obligations. We believe that deployment of advanced services should be largely driven by market forces. Therefore, we agree that giving ILECs the option of providing advanced telecommunications services through separate subsidiaries, with appropriate safeguards, may enhance the ability of all carriers to respond to competitive market pressures.

With respect to additional local loop unbundling obligations and strengthening collocation requirements, we have adopted sub-loop unbundling requirements and alternative

September 25, 1998

collocation arrangements. We are also mindful of the importance of ensuring that network reliability is maintained as further unbundling is implemented. We are monitoring these developments.

Further, in addition to physical and virtual collocation arrangements other options are under consideration in New York.<sup>3</sup> In any event, any Commission action should not impede state flexibility.

### Discussion

#### I. Provision of Interstate Advanced Services Through A Separate Affiliate

##### A. Structural Separation

The Commission concludes that interstate advanced services offered by ILECs are subject to §251(c) requirements (interconnection, unbundling, resale, and collocation) (para. 32).<sup>4</sup> The Commission suggests that ILECs may avoid these requirements by establishing a separate advanced services affiliate with specified structural safeguards (i.e., independent

---

<sup>3</sup> Although national rules are not necessary, any collocation and local loop unbundling requirements established by the Commission should not prescribe states from continuing to pursue over unbundling and collocation policies, pursuant to the 1996 Act.

<sup>4</sup> The Commission indicates that specific advanced services will be classified as telephone exchange or exchange access service on a case-by-case basis (para. 40). In requesting states to treat affiliates that provide intrastate advanced services "equivalently to any other competing carrier offering advanced services," the Commission implicitly recognizes state jurisdiction over intrastate advanced services. We acknowledge the Commission's request and are examining the appropriate treatment of intrastate advanced services.

September 25, 1998

operations, arm's length transactions, etc.), and provided that the affiliate's own facilities are used to provide advanced services (para. 83, 86, 92 and 96).<sup>5</sup> Any transaction between the advanced services affiliate and the ILEC must be at arm's length (para. 87).

The fundamental issues are: (1) whether the requirements imposed on ILECs, particularly resale and unbundling (section 251(c)), so reduce ILEC incentives to invest in new technologies that they will choose not to deploy advanced services "on a reasonable and timely basis"; and, conversely, (2) whether freeing the incumbents from these requirements will unreasonably impede new entrants' (CLECs) abilities to offer broadly advanced services. Although ILECs' incentives to deploy advanced services may be diminished by the Act's unbundling and resale requirements, there is a reasonable possibility that ILECs (choosing the separate advanced services affiliate option) will have an additional incentive to provide all CLECs reasonable access to their underlying basic local networks because the affiliate will also require such access. Also, although access to the incumbent's advanced services capabilities on a resale or network element basis should enhance the CLEC's abilities to offer these services, it is not clear that lack of such access

---

<sup>5</sup> The Commission identifies specific factors where the advanced services affiliate would be considered an assign of the ILEC (i.e., wholesale asset transfers).

September 25, 1998

would fatally impede this ability. In light of these considerations, we believe the ILECs may reasonably be given the option of providing advanced services through a separate affiliate, not subject to ILEC requirements.

**B. Proposed Safeguards**

Recognizing state commissions' experience in dealing with LEC affiliates, the Commission invites input from the states on: 1) appropriate separation requirements for the advanced services affiliate (para. 88), and 2) how particular transactions (i.e., asset transfers) between the ILEC and the advanced services affiliate should affect the regulatory status of the affiliate (para. 104).<sup>6</sup>

The proposed requirements for advanced services affiliates wishing to avoid ILEC regulation under section 251(c) are similar to the rules identified in section 272, which establish standards required for BOC affiliates engaging in manufacturing and certain types of interLATA activities.<sup>7</sup> As noted above, a separate advanced services affiliate (as described in the NPRM) could provide a viable option for deploying advanced

---

<sup>6</sup> To the extent intrastate advanced services are provided by the separate ILEC affiliate, the Commission requests states to exercise their jurisdiction over intrastate communications in a manner that treats the affiliate as they would treat CLECs offering similar services (para. 116).

<sup>7</sup> Section 272 requires BOC LECs to provide these services through a separate affiliate.



September 25, 1998

services while minimizing the potential risk for anti-competitive behavior.

During the transition to a fully competitive market, federal and state examination of affiliate transactions may be necessary to ensure that technology at the ILEC is not "frozen" while the unregulated affiliate reaps the economic rewards of advanced technology -- technology that might later make the ILEC's circuit-switched network obsolete. (See, 47 C.F.R. 53.201 et seq. and New York Public Service Law §99). A shift of ILEC customers to an affiliate that provides combined voice/video/data could leave the ILEC serving only consumers who cannot afford such services, or whose facilities have not been modernized to maintain the provisioning of basic telecommunication services. Thus, we agree with the Commission (para. 117) that it should work cooperatively with the states to ensure that ILECs do not allow their existing networks to deteriorate where advanced services are offered through an affiliate

Further, we agree that the advanced services subsidiary should be subject to existing federal and state rules for similarly-situated affiliates unless it can be shown that these requirements are unnecessary. In this regard, the in-region long-distance affiliate requirements provide a close parallel of the type of additional federal protections that should be adopted. (See, 47 U.S.C. 272; 47 C.F.R. 53.201-53.213). Both

September 25, 1998

the in-region long-distance affiliate and the advanced services affiliate will provide core telecommunications services. Therefore, the Commission's tentative conclusion that the advanced services affiliate safeguards should mirror the safeguards required of long-distance affiliates appears reasonable. In addition, we recommend that the Commission, along with the states, monitor ILEC marketing practices to ensure that ILECs do not use their local loop market power to require customers to purchase services from an advanced services affiliate in order to receive favorable treatment with respect to its other ILEC services. Such practices, if allowed, would thwart structural separation policies. Consequently, the affiliated advanced services should be treated as an integrated ILEC offering and subject to §251(c).

Finally, we recommend that, during the transition, any joint marketing between the ILEC and the advanced services affiliate should be subject to the same joint marketing provisions applicable to the long distance affiliate.<sup>9</sup> See, 47 U.S.C. §272(g); 47 C.F.R. 53.201.

---

<sup>9</sup> Section 272(g) prohibits a BOC affiliate from marketing its services with BOC local exchange service unless competitors offering the same or similar service are also allowed to jointly market and sell the BOC's local exchange service.

September 25, 1998

**C. Asset Transfers From ILEC To  
Advanced Services Affiliate**

The Commission tentatively concludes, subject to any de minimis exception adopted, that a wholesale transfer of ILEC assets (including local loop) used to provide advanced services would make the affiliate an "assign" of the ILEC, and, therefore, subject to 251(c) requirements.<sup>9</sup> The Commission seeks comment on (1) whether there should be a de minimis exception under which a limited transfer of equipment would not make an advanced services affiliate an "assign" and (2) what should be deemed a de minimis exception (para. 108). The Commission tentatively concludes that a de minimis exception should apply only to transfers of facilities used specifically to provide advanced services, such as DSLAMs and packet switches (but not other network elements, such as, loops). We agree with the Commission's tentative conclusion that, subject to any de minimis exception, a wholesale transfer of facilities would make an affiliate an "assign" of the incumbent LEC and subject to 251(c) provisions (para. 106). The NYDPS also concurs with the Commission's conclusion that a de minimis exception should apply only to ILEC transfers of

---

<sup>9</sup> Both the states and the Commission have jurisdiction over asset transfers -- the states with respect to assets used for intrastate communications (See, New York Public Service Law § 99) and the Commission with respect to interstate communications (para. 106).

September 25, 1998

facilities and equipment used specifically to provide advanced services.<sup>10</sup>

The Commission's tentative conclusion with respect to the types of asset transfers that should subject the affiliate to the Act's requirements as an ILEC appears reasonable. We note, however, that the asset transfers remain subject to state regulatory oversight. (See, New York Public Service Law §99). Thus, the Commission should make it clear that it does not intend to supplant state asset transfer requirements.

## II. Collocation Requirements

The Commission adopted minimum national collocation requirements in the Local Competition Order (Local Competition Order para. 555-617)<sup>11</sup> and seeks comment on whether it should establish additional minimum national rules (para. 122-124). Comment is also sought on equipment requirements as well as space allocation and space exhaustion issues (para. 126-150). Although we do not believe that additional national requirements are necessary, any rules adopted by the Commission should not

---

<sup>10</sup> Any transfer of local loops, as the Commission notes, would make an advanced services affiliate an "assign" with respect to those loops and subject to the provisions of section 251(c) (para. 107).

<sup>11</sup> In the Matter of Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket No. 96-98, First Report and Order, (August 8, 1996). Physical and virtual collocation are included in the Commission's list of methods for obtaining interconnection and access to unbundled network elements. 47 C.F.R. 51.321.

September 25, 1998

interfere with additional state approved options. (See, 47  
U.S.C. §251(d)(3)).

In New York, physical and virtual collocation arrangements have been adopted. Also, New York Telephone Company d/b/a Bell Atlantic-New York (BANY) offered, in its §271 Pre-filing Statement, to provide smaller cages, shared collocation, and new virtual collocation arrangements.<sup>12</sup> Additional collocation arrangements are under consideration in a pending NYDPS proceeding.<sup>13</sup> These options include:

1. Cageless Collocation,<sup>14</sup>
2. Identified Space Collocation,<sup>15</sup>

---

<sup>12</sup> NYPSC Case 97-C-0271 Prefiling Statement of Bell Atlantic - New York (dated April 6, 1998).

<sup>13</sup> NYPSC Case 98-C-0690 - Proceeding on Motion of the Commission to Examine Methods by which Competitive Local Exchange Carriers Can Obtain and Combine Unbundled Network Elements.

<sup>14</sup> The NYPSC is currently considering a cageless collection tariff filed by BANY. This option, called Secured Collocation Open Physical Environment (SCOPE), is a physical collocation area located in a secure part of the central office, but without a cage enclosure around each individual competitive LEC's equipment. The SCOPE is isolated from the incumbent's central office equipment, which differentiates SCOPE from virtual collocation. SCOPE uses a shared point of termination. Additionally, it uses substantially less space than traditional collocation.

<sup>15</sup> In this configuration a collocater would install and maintain its own equipment in a defined, finite and separate space. Equipment would be intermingled with the incumbent's equipment where space is available, and separated racks and equipment would be easily identifiable. This option was developed for interconnection purposes and not for combinations of loops and ports.

September 25, 1998

3. Virtual Collocation With Robot,<sup>16</sup>
4. Assembly Room and Assembly Point, and<sup>17</sup>
5. Recent Change Capability.<sup>18</sup>

Regarding the Commission's tentative conclusion that ILECs should not be permitted to impede CLECs from offering advanced services by imposing unnecessary restrictions on the type of equipment CLECs may collocate, including switching functionality (para. 129), we believe that allowing collocation of switching equipment may be more efficient than requiring CLECs to install duplicative lines to make calls within the same central office. In the BANY-MCI interconnection agreement, the

---

<sup>16</sup> This arrangement could be used by a competitive LEC to recombine loops and ports through the use of a remotely controlled cross-connect device, or robot.

<sup>17</sup> This option is for voice grade service only. Links and ports can be combined on a cross-connection box located on an outside wall or pad mounted on the grounds of the central office.

<sup>18</sup> This method is a software-based option that can combine existing loops and ports, but cannot be combined with any other unbundled elements.

September 25, 1998

NYPSC concluded that BANY had not identified a roadblock that would prevent collocation of switching equipment.<sup>19</sup>

### III. Unbundling Obligations

Comment is sought on the extent to which the Commission should establish additional minimum national rules for local loops, pursuant to sections 201 and 251 of the Act, in order to strengthen the ability of new entrants to gain access to xDSL compatible loops (para. 151).<sup>20</sup> With respect to the extent of local loop unbundling, the NYDPS has approved interconnection agreements that define various levels of loop unbundling by allowing for the purchase of four sub-loop components (loop

---

<sup>19</sup> The NYPSC's arbitration decision granted MCI the right to collocate switching equipment. On rehearing, BANY claimed that digital switching equipment required special grounding arrangements. The NYPSC denied rehearing on this issue, finding that the need to add special grounding for any central office based switching equipment is a common industry practice. Case 96-C-0787 Petition of MCI Telecommunications Corporation Pursuant to Section 252(b) of the Telecommunications Act of 1996, for Arbitration to Establish An Intercarrier Agreement Between MCI and New York Telephone Company, Opinion No. 96-33, Opinion and Order Resolving Arbitration Issues (Issued and Effective December 23, 1996); Opinion No. 97-3, Opinion and Order Granting In Part, Denying In Part, and Dismissing Petitions for Rehearing and Clarification (Issued and Effective April 11, 1997); Order Approving Interconnection Agreement, Rejecting Notions Thereof, and Granting Reconsideration (Issued and Effective October 1, 1997). MCI has challenged the NYDPS' arbitration decision and BANY has filed a cross claim challenging the legality of allowing collocation of switching equipment. The matter has been briefed and the parties are awaiting a date for oral argument. MCI v. Bell Atlantic and New York Public Service Commission (N.D.N.Y.)

<sup>20</sup> The Commission has determined that the local loop is a network element that ILECs must unbundle "at any technical feasible point." Local Competition Order para. 377-379.

September 25, 1998

feeder, loop concentrator/multiplexer, network interface device, and loop distribution) to the extent technically feasible in response to a specific request.<sup>21</sup> Additionally, BANY recently filed a tariff, which is subject to NYPSC approval, to provide Expanded Extended Loop service. This proposed service is designed to allow CLECs to reduce the need for multiple collocation sites by aggregating loops from non-located central offices at one collocation office. We see no need for additional national rules. (See, section 251(d)(3)).

The Commission has also requested extensive technical information relating to the provision by ILECs of local loops capable of supporting CLEC-provided xDSL services and about the feasibility of requiring ILECs to unbundle such loops to enable CLECs to provide some portions of the loops themselves. Although requiring loop unbundling might well facilitate the development of competition for advanced services, such action requires careful consideration of the potential impacts on the quality of telephone service and accountability for the service quality provided. The NYDPS supports the Commission's efforts to

---

<sup>21</sup> See, NYPSC Case 96-C-0787 Petition of MCI Telecommunications Corporation, Pursuant to Section 252(b) of the Telecommunications Act of 1996, for Arbitration to Establish an Inter-carrier Agreement Between MCI and New York Telephone Company, Opinion No. 96-33, Opinion and Order Resolving Arbitration Issues, p. 12, Order Approving Interconnection Agreement, Rejecting Portions Thereof, and Granting Reconsideration, p. 10-11 (Issued and Effective October 1, 1997).



September 25, 1998

gather additional information. At the same time, we will be monitoring service quality results to ascertain the impact of loop unbundling. Since it is difficult to predict the impact various levels of local loop unbundling will have on service quality, the states must maintain flexible policies and it is incumbent upon the Commission not to take actions that will interfere with state monitoring.

#### CONCLUSION

As the advanced services market develops, competing technologies and providers will offer consumers alternative services, prices, and features. The NYDPS supports regulatory policies, such as giving ILECs the option of providing advanced services through a separate affiliate, designed to enable the growth of such competition. As discussed supra, additional national unbundling and collocation rules, however, are not necessary. Yet, if additional minimum standards are established,

Comments of the New York Department  
of Public Service - CC Docket No. 98-147

September 25, 1998

they should not hamper the states' ability to respond to local  
conditions.

Respectfully submitted,

*Cheryl S. Callahan*  
*for*

Lawrence G. Malone  
General Counsel  
New York State Department  
of Public Service  
Three Empire State Plaza  
Albany, NY 12223-1350  
(518) 474-2510

Of Counsel  
Cheryl Callahan

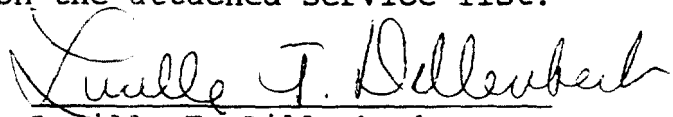
Dated: September 25, 1998  
Albany, New York

In the Matters of

Deployment of Wireline Services	)	CC Docket No. 98-147
Offering Advanced Telecommunications	)	
Capability	)	
Petition of Bell Atlantic Corporation	)	CC Docket No. 98-11
For Relief from Barriers to Deployment	)	
of Advanced Telecommunications Services	)	
Petition of US WEST Communications, Inc.	)	CC Docket No. 98-26
For Relief from Barriers to Deployment	)	
of Advanced Telecommunications Services	)	
Petition of Ameritech Corporation to	)	CC Docket No. 98-32
Remove Barriers to Investment in	)	
Advanced Telecommunications Technology	)	
Petition of the Alliance for Public	)	CCB/CPD No. 98-15
Technology Requesting Issuance of	)	RM 9244
Notice of Inquiry and Notice of	)	
Proposed Rulemaking to Implement	)	
Section 706 of the 1996 Telecommuni-	)	
cations Act	)	
Petition of the Association for	)	CC Docket No. 98-78
Local Telecommunications Services	)	
(ALTS) for a Declaratory Ruling	)	
Establishing Conditions Necessary to	)	
Promote Deployment of Advanced	)	
Telecommunications Capability Under	)	
Section 706 of the Telecommunications	)	
Act of 1996	)	
Southwestern Bell Telephone Company,	)	CC Docket NO. 98-91
Pacific Bell, and Nevada Bell Petition	)	
for Relief from Regulation Pursuant to	)	
Section 706 of the Telecommunications	)	
Act of 1996 and 47 U.S.C. Section 160	)	
for ADSL Infrastructure and Service	)	

CERTIFICATE OF SERVICE

I, Lucille T. Dillenbeck, hereby certify that I have served the within and foregoing New York State Department of Public Service Comments, by depositing a copy thereof, postage prepaid, in the United States mail, properly addressed upon each of the parties as reflected on the attached service list.

  
Lucille T. Dillenbeck

Dated: September 25, 1998  
Albany, New York

James Lanni  
Rhode Island Division  
of Public Utilities  
100 Orange Street  
Providence RI 02903

Joel B. Shifman  
Maine Public Utility Commission  
State House Station 18  
Augusta ME 04865

Charles F. Larken  
Vermont Department of  
Public Service  
120 State Street  
Montpelier VT 05602

Rita Barmen  
Vermont Public Service Board  
89 Main Street  
Montpelier VT 05602

Keikki Leesment  
New Jersey Board of  
Public Utilities  
2 Gateway Center  
Newark NJ 07102

Veronica A. Smith  
Deputy Chief Counsel  
Pennsylvania Public Utility  
Commission  
P.O. Box 3265  
Harrisburg PA 17105-3265

Mary J. Sisak  
District of Columbia  
Public Service Commission  
Suite 800  
450 Fifth Street  
Washington DC 20001

Telecommunications Report  
1333 H Street, N.W. - 11th Floor  
West Tower  
Washington DC 20005

International Transcription  
Services, Inc.  
1231 20th Street  
Washington DC 20036

Brad Ramsay  
NARUC  
Interstate Commerce  
Commission Bldg., Room 1102  
12th & Constitution St., NW  
Washington DC 20044

Magalie Roman Salas  
Secretary  
Room 222  
Federal Communications Commission  
1919 M Street, NW  
Washington DC 20554

Kathryn C. Brown, Chief  
Common Carrier Bureau  
Federal Communications Commission  
1919 M Street, NW  
Washington DC 20554

Camille Stonehill  
State Telephone Regulation  
Report  
1101 King Street  
Suite 444  
Alexandria VA 22314

Alabama Public Service  
Commission  
P.O. Box 304260  
Montgomery AL 36130-4260

Archie R. Hickerson  
Tennessee Public Service  
Commission  
460 James Robertson Pky.  
Nashville TN 37219

Sandy Ibaugh  
Indiana Utility  
Regulatory Commission  
901 State Office Bldg.  
Indianapolis IN 46204

Ronald Choura  
Michigan Public  
Service Commission  
6545 Mercantile Way  
Lansing MI 48910

Mary Street  
Iowa Utilities Board  
Lucas Building  
5th Floor  
Des Moines IA 50316

Gary Evenson  
Wisconsin Public  
Service Commission  
P.O. Box 7854  
Madison WI 53707

Gordon L. Persinger  
Missouri Public Service  
Commission  
P.O. Box 360  
Jefferson City MO 65102

Sam Loudenslager  
Arkansas Public Service  
Commission  
1200 Center Street  
P.O. Box C-400  
Little Rock AR 72203

Maribeth D. Swapp  
Deputy General Counsel  
Oklahoma Corp. Commission  
400 Jim Thorpe Building  
Oklahoma City OK 73105

Marsha H. Smith  
Idaho Public Utilities  
Commission  
Statehouse  
Boise ID 83720

Edward Morrison  
Oregon Public Utilities  
Commission  
Labor and Industries Bldg.  
Room 330  
Salem OR 97310

Mary Adu  
Public Utilities Commission of the  
State of California  
505 Van Ness Avenue  
San Francisco CA 94102

Rob Vandiver  
General Counsel  
Florida Public Service  
Commission  
2540 Shumard Oak Blvd.  
Tallahassee FL 32399-0850

Glenn Blackmon  
Washington U&TC  
1300 S. Evergreen Park Dr., S.W.  
P.O. Box 47250  
Olympia WA 98504-7250

Janice M. Myles  
Policy and Planning Division  
Common Carrier Bureau  
Federal Communications Commission  
1919 M Street, N.W. - Room 544  
Washington DC 20554

Myra Karegianes  
General Counsel  
Illinois Commerce Commission  
State of Illinois Building  
160 No. LaSalle - Suite C-800  
Chicago IL 60601-3104

Margie Hendrickson  
Assistant Attorney General  
Manager, Public Utilities Division  
121 7th Place East, Suite 350  
St. Paul MN 55101

Robin McHugh  
Montana PSC  
1701 Prospect Avenue  
P.O. Box 202601  
Helena MT 59620-2601

Cynthia Norwood  
Virginia State Corp. Commission  
P.O. Box 1197  
Richmond VA 23201

Deonne Brunning  
Nebraska PSC  
1200 N. Street  
Lincoln NE 68508

Wanda Harris  
Common Carrier Bureau  
1919 M Street, N.W.  
Room 518  
Washington DC 20554

Diane Munns  
Iowa Utilities Board  
Lucas State Office Building  
Des Moines, IA 50319

Chairman  
Maryland Public Service Commission  
6 St. Paul Street  
16th Floor  
Baltimore, MD 21202-6806

The Hon. Michael K. Powell  
Commissioner  
Federal Communications Commission  
1919 M Street, NW, Rm 844  
Washington, D.C. 20554

The Hon. Gloria Tristani  
Commissioner  
Federal Communications Commission  
1919 M Street, NW  
Washington, D.C. 20554

The Hon. William E. Kennard  
Commissioner  
Federal Communications Commission  
1919 M Street, NW, Rm. 814  
Washington, D.C. 20554

The Hon. Susan Ness  
Commissioner  
Federal Communications Commission  
1919 M Street, NW, Rm. 832  
Washington, D.C. 20554

The Hon. Harold Furchgott-Roth  
Commissioner  
Federal Communications Commission  
1919 M Street, NW, Rm. 832  
Washington, D.C. 20554

Bill Allen  
Bell Atlantic Telephone Corp.  
158 State Street  
Albany, New York 12207

Mary Liz Hepburn  
Bell Atlantic Telephone Corp.  
1300 I Street, N.W.  
Washington, D.C. 20005

John F. Raposa  
GTE Service Corporation  
600 Hidden Ridge  
HQE03J27  
Irving, Texas 75038

M. Robert Sutherland  
Bell South Telecommunications,  
Inc.  
1155 Peachtree Street, N.E.  
Atlanta, Georgia 30309-3618

Durward D. Dupre  
Pacific Bell Telephone Company  
One Bell Plaza, Suite 3703  
Dallas, Texas 75202